

**IN THE U.S. DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE**

**UNITED STATES,
Plaintiff.**

v.

**DOMINIC D'ANGELO BROWN,
Defendant.**

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Docket No. 3;20-CR-55

SENTENCING MEMORANDUM

COMES NOW, Defendant Dominic D'Angelo Brown, by and through counsel, and files this, his Sentencing Memorandum, in compliance with the Court's Order in the above-styled and numbered cause, and would show unto the Court the following:

- 1.) A Presentence Investigation Report (PSR) was filed in this case on or about October 5, 2021, following an interview by United States Probation Officer Tara G. Wood. Defendant accepts as accurate the facts and averments contained therein. Pursuant to U.S.C. Sec. 3553(a), Defendant concurs with the Assistant United States Attorney that a sentence at the bottom of the applicable U.S. Sentencing guidelines, followed by a period of supervised release, would be meet and just under the facts of this case.
- 2.) Should the Court wish, your Defendant is prepared to offer proof at the sentencing Hearing, specifically the testimony of Defendant's fiancée Odessa Johnson, effectively his only family, who would testify as to the remorse and regret Defendant has for his actions. However, unless the Court specifically requests such testimony, Defendant does not plan to call witnesses.

RESPECTFULLY SUBMITTED on this, the 16th day of October, 2021.

By: _____
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